

FILED

SEP 27 2019

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEVIN SHELTON JR.,

Defendant.

4:19MJ06341 PLC

MOTION FOR PRETRIAL DETENTION

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Gregory M. Goodwin, Special Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with one count of carjacking in violation of Title 18, United States Code, Section 2119; one count of Possession of Heroin, a Schedule I Controlled Substance, with Intent to Distribute in violation of Title 21 United States Code, Section 841(a); one count of Possession of Methamphetamine, a Schedule II Controlled Substance, with Intent to Distribute in violation of Title 21 United States Code, Section 841(a), and one count of Possession of a Firearm in Furtherance of a Drug Trafficking Offense in violation of Title 18 United States Code Section 924(c). These charges raise a presumption that Defendant should be detained.

2. In this case, Defendant attempted to sell controlled substances to W.W., and then entered W.W.'s car and pointed a Glock pistol at W.W. Defendant then told W.W. to drive to the 4800

block of Cupples. Once there, W.W. attempted to flee on foot from Defendant and from W.W.'s car, and Defendant fired a shot at W.W.

3. The Glock pistol used by Defendant had previously been reported stolen and was equipped with a high capacity drum magazine. Defendant was in possession of 116 capsules of Heroin, a schedule I controlled substance, weighing 12.53 grams. Defendant was also in possession of 82 methamphetamine pills, a schedule II controlled substance, weighing 11.81 grams.

4. For a fuller statement of the Defendant's conduct in this case, see the Affidavit in Support of a Criminal Complaint.

5. Defendant has been charged in the Circuit Court for the City of St. Louis for some of the actions in this case, but has been issued a summons in that matter. *See* 1922-CR03088 (St. Louis City Circuit Court).

6. Defendant committed this crime after having been issued a summons in St. Louis County Circuit Court for similar conduct on August 8, 2019. Specifically, Defendant Shelton Jr. is charged with Property Damage in the First Degree and Resisting Arrest for a Felony in connection with attempting to flee from law enforcement officers who were attempting to stop Shelton Jr. in connection with a report of shoplifting. Shelton Jr. and another person entered a vehicle and Shelton Jr. drove the vehicle into a victim's parked car before also striking two police cars and leading officers on a high speed chase and weaving in and out of traffic. *See* 19SL-CR05214 (St. Louis County Circuit Court).

7. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant, the defendant's history and characteristics; and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release, warrant defendant's detention pending trial warrant defendant's detention pending trial.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

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s/Gregory M. Goodwin
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